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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91198919
Party	Defendant Rule 66, LLC
Correspondence Address	POLLIE GAUTSCH G&A LEGAL, APC 2033 SAN ELIJO AVE # 201 CARDIFF, CA 92007-1726 pollie@gandalegal.com
Submission	Answer
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Date	04/18/2011
Attachments	Rule 66 Opposition Response Lady Ha Ha 4-18-11.pdf (4 pages)(84477 bytes)

1. Applicant admits that Opposer is a well-known famous personality and admits the allegations of this paragraph.
2. Applicant admits the allegations of this paragraph.
3. Applicant admits the allegations of this paragraph.

4. Applicant admits the allegations of this paragraph.
5. Applicant admits the allegations of this paragraph.
6. Applicant admits the allegations of this paragraph.
7. Applicant admits the allegations of this paragraph.
8. Applicant is without sufficient information to form a belief as to matters set forth in this paragraph and, on that basis, denies those allegations.
9. Applicant is without sufficient information to form a belief as to matters set forth in this paragraph and, on that basis, denies those allegations.
10. Applicant is without sufficient information to form a belief as to matters set forth in this paragraph and, on that basis, denies those allegations.
11. Applicant is without sufficient information to form a belief as to the date Opposer first commenced use of the mark LADY GAGA set forth in this paragraph and, on that basis, denies those allegations.
12. Applicant denies the allegations of this paragraph. Applicant believes there will be no consumer confusion and that consumers are very familiar with LADY GAGA and will not become confused between the mark LADY GAGA and LADY HA HA.
13. Applicant admits the allegations of this paragraph.
14. Applicant denies the allegations of this paragraph.
15. Applicant denies the allegations of this paragraph.
16. Applicant denies the allegations of this paragraph.
17. Applicant denies the allegations of this paragraph.

AFFIRMATIVE DEFENSES

First Affirmative Defense

Opposer has failed to state a claim upon which relief can be granted.

Second Affirmative Defense

Applicant hereby gives notice that it may rely on any other defenses that may become available or appear proper during discovery, and hereby reserves its right to amend this Answer to assert any such defenses.

WHEREFORE, Applicant requests that this Opposition be dismissed with prejudice in its entirety, that the application that is the subject of this Opposition be permitted to proceed to registration, and requests that this Board grant to Applicant such other and further relief as it deems just and proper..

Dated: April 18, 2011

Respectfully submitted,

_____/pollie gautsch/
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CERTIFICATE OF FILING

I certify that this ANSWER TO NOTICE OF OPPOSITION is being submitted electronically to the Trademark Trial and Appeal Board at the United States Patent and Trademark Office on this 18th day of January 2011.

_____/pollie gautsch/_____
Pollie Gautsch

CERTIFICATE OF SERVICE

I certify that a copy of this ANSWER TO NOTICE OF OPPOSITION is being served on the Attorney of Record for the Petitioner by mailing it via First Class Mail postage prepaid, on the 18th day of April 2011, as follows:

Brad D. Rose, Esq.
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_____/pollie gautsch/_____
Pollie Gautsch